

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

-against-

MATTHEW QUEEN,

Defendant.

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DECLARATION

24 Cr. 291 (LAK)

SAM A. SCHMIDT, ESQ. declares under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am the attorney for MATTHEW QUEEN, the defendant indicted in the present case, and as such am fully familiar with the facts and circumstances of the case and the prior proceedings had therein. This declaration is made in support of the attached Notice of Motion to Dismiss the Indictment and Information charging the defendant of a violation of 18 U.S.C. § 1519, Falsification of Records.

2. The allegations of fact are stated in the accompanying Memorandum of Law.

3. The allegations of fact are based upon counsel's review of the Information and Indictment, discovery material received from the government and

conversations with my client.

4. Though counsel previously received some of the discovery previously, I received almost a gigabyte of material on August 27, 2024. I do not expect that the new material will require additional pretrial motions. If, after review, I believe additional motions are required I will make a request to your Honor.

WHEREFORE, it is respectfully requested that the Court grant defendant's motion in its entirety.

I declare under penalty that the allegations of fact in the Memorandum of Law is true and correct to the best of my knowledge and belief. 28 U.S.C. §1746.
Executed August 29, 2024.

/s/
SAM A. SCHMIDT
Attorney for Matthew Queen